

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MONIQUE Da SILVA MOORE, et al., : 11-CV-1279
:
Plaintiffs, :
v. :
:
PUBLICIS GROUPE, et al., : 500 Pearl Street
:
Defendants. : New York, New York
:
-----X January 12, 2012

TRANSCRIPT OF CIVIL CAUSE FOR STATUS CONFERENCE
BEFORE THE HONORABLE ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

APPEARANCES:

For the Plaintiffs: JANETTE LYNN WIPPER, ESQ.
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For the Defendants: JEFFREY W. BRECHER, ESQ.
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1 MS. CHAVEY: Victoria Chavey for defendant MSL
2 Group.

3 MR. BRECHER: Jeff Brecher also for defendant MSL
4 Group.

5 MALE VOICE: George [inaudible] for MSL Group.

6 MS. WIPPER: Janette Wipper for plaintiff and the
7 class.

8 THE CLERK: Is that everyone?

9 MS. WIPPER: Your Honor, with me I also have
10 [inaudible] and Eva Gustane for plaintiffs in the class.

11 THE COURT: Good afternoon. Let me get a little
12 background information, just a little bit of background
13 factual information on this case. I know previously Judge
14 Sullivan ruled on a discovery dispute between the parties
15 regarding medical records and testimony regarding medical
16 issues.

17 Subsequent to that conference and that ruling the
18 parties had a further discovery dispute that was referred to
19 Judge Peck and Judge Peck basically issued a ruling
20 essentially adopting what Judge Sullivan had previously ruled.
21 It's my sense that the situation has become further clarified
22 and was clarified further by the time the parties went before
23 Judge Peck as opposed to the time before the parties were
24 in -- were before Judge Sullivan regarding what the plaintiffs
25 were seeking in this case regarding emotional damages and that

1 the plaintiffs are making it clear that they are seeking only
2 garden variety emotional damages.

3 My sense is also that the defendants are a little
4 skeptical about that and are not quite sure what the
5 plaintiffs mean when they say garden variety emotional
6 damages.

7 Is that a fair synopsis at this point?

8 MS. WIPPER: Yes, Your Honor. This is Janette Wipper
9 for the plaintiff.

10 THE COURT: From defendant's perspective?

11 MR. BRECHER: Judge, Jeff Brecher on behalf of the
12 defendant. Yes, I think that's a pretty accurate summary.

13 THE COURT: Let me get a sense. When Judge Sullivan
14 ruled on these medical records and ordered the plaintiffs to
15 turn over these medical records and the plaintiffs could be
16 deposed about medical issues, I'm just trying to figure out
17 were those medical issues all related to mental health issues
18 or were there other medical records that the parties feel are
19 relevant in this case.

20 Let me hear from plaintiffs.

21 MS. WIPPER: Your Honor, our position is that the
22 plaintiff is seeking only garden variety damages and for that
23 reason medical records will not be relied on by the plaintiffs
24 to prove those claims. Therefore, medical information is not
25 relevant.

1 THE COURT: But I guess I want to get clarification.
2 You're saying medical records. Again, the cases in SIMS and
3 its progeny refer to the privilege between a patient and
4 psychotherapists or related mental health license
5 professionals. I'm just trying to clarify. Are there other
6 medical records such, for example, from a general
7 practitioner, gastroenterologist anything of that nature?

8 MS. WIPPER: Our position is although that the
9 privilege is limited for the psycho [inaudible] privilege we
10 also [inaudible - phone breaking up] are irrelevant in the
11 context of garden variety plaintiffs.

12 MR. BRECHER: Judge, this is Jeff Brecher on behalf
13 of MLS Group.

14 THE COURT: Okay.

15 MR. BRECHER: I think you hit the nail on the head
16 when you summarized what happened before that they keep
17 stating that they're willing to limit their damages to the
18 garden variety benefits but it's not defined. So we are in
19 somewhat of a difficult position because we don't know what
20 they are proposing with respect to that term and therefore we
21 can't make a determination whether we will need medical
22 records and psychological records.

23 THE COURT: Let me --

24 MS. WIPPER: Your Honor --

25 THE COURT: Let's do this. Let's -- for the time

1 being let's focus on simply the medical records related to
2 psychotherapists and mental health counseling records. Let's
3 deal with that issue first. Let me get a sense from the
4 plaintiffs again in terms of what it is that you're going to
5 be seeking in terms of your garden variety emotional damages
6 here in this case.

7 MS. WIPPER: Your Honor, because we're seeking only
8 garden variety I will not be [inaudible] medical evidence for
9 those claims and will not be [inaudible] mental state of our
10 plaintiffs at issue. Under Second Circuit case law
11 [inaudible] the Second Circuit and District Court in the
12 circuit have recognized awards as high as \$125,000.00, even
13 higher for garden variety. We would only be seeking garden
14 variety damages within the range of [inaudible] allowed in
15 this circuit.

16 THE COURT: I understand that but I guess what I'm
17 trying to get a little bit more clarification on is the case
18 law indicates that garden variety emotional damages are
19 limited to the sort of garden variety damages that results
20 directly from the alleged discrimination. Again, we're trying
21 to eliminate any sort of tertiary damages that are claimed as
22 a result of that. So if you could just give me an example of
23 what you're talking about so that we can have clear
24 delineation so that we don't -- as clear as we can at this
25 point.

1 For example, you're indicating that there may be
2 other medical records that would not be records related to
3 psychotherapy and that raises some concerns in terms of what
4 the plaintiffs again will be seeking in terms of their garden
5 variety emotional damages. For example, are the plaintiffs
6 going to claim, for example, as a result of this alleged
7 discrimination I was frustrated and upset and things of that
8 general nature. I think that would be fine but the question
9 is what else is going to be added after that. Are the
10 plaintiffs going to be saying as a result of this I couldn't
11 sleep and since I couldn't sleep I developed these other
12 problems and I couldn't eat and my stomach was in knots and
13 therefore I had problems even though not bringing in medical
14 experts but talking in general terms about physical
15 conditions? That's where I'm a little bit concerned. That's
16 what I'm trying to get a little bit more information about
17 from the plaintiffs.

18 MS. WIPPER: Your Honor, plaintiffs would only be
19 seeking the [inaudible] related [inaudible] the discrimination
20 they suffered at MSL. For example, one of the plaintiffs was
21 terminated after her return from maternity leave after being
22 at the company for 13 years. That obviously was a stressful
23 experience for her as it would be for any reasonable person.
24 So to the extent that these damages are the garden variety
25 damages would be related to that type of stress. We're not

1 alleging that any of the plaintiffs have experienced any kind
2 of condition or have been diagnosed with any type of condition
3 due to what happened at work.

4 THE COURT: Let me hear from defendants a little
5 further on this.

6 MR. BRECHER: Certainly, Your Honor. This is Jeff
7 Brecher again. So the distinction that you're making is I
8 think distinction that is set forth in the decision that you
9 mentioned and if they're going to testify that they felt upset
10 and frustrated and hurt I think that falls on the garden
11 variety side but if there's going to be any testimony relating
12 to any kind of medical condition or symptom such as I'm
13 suffering anxiety or I feel depressed or I'm suffering from
14 sleeplessness, anything that goes beyond that I think that
15 that falls on the other side.

16 We just want a clear stipulation or representation
17 by plaintiffs as to what they're seeking so that we don't have
18 an issue later on where they're trying to testify to something
19 and then we don't have the record and then the question well,
20 why don't we have a record because they said they were going
21 to testify or we didn't understand what they meant by garden
22 variety. So that's our position.

23 THE COURT: Thank you. So let me make sure that I'm
24 clear on what plaintiffs are saying. So are plaintiffs
25 indicating that they're not going to be seeking any sort of

1 damages as a result of any sort of physical manifestations
2 caused by the alleged discrimination here other than again
3 garden variety frustrating -- being frustrated, being angry,
4 being sad? But, again, I'm trying to get a sense of
5 plaintiffs are going to be saying I was -- for example, I was
6 so upset that I couldn't sleep, I was so upset and so
7 frustrated that my stomach hurt for days on end. I'm not --
8 that may raise other concerns. It may not necessarily but it
9 may raise other concerns. It may not necessarily raise
10 concerns about the records of the psychotherapist but again
11 I'm a little concerned now that I'm -- now that I have
12 clarification that there are other medical records which we'll
13 deal with later, but if in fact -- well, let me hear from
14 plaintiffs on that before I go on.

15 MS. WIPPER: To the extent that there's any medical
16 records beyond the psychotherapist, medical records that are
17 privileged with respect to garden variety claims, we would
18 produce those records assuming that it addressed medical
19 conditions related to work or the discrimination claims that
20 we have been alleging.

21 THE COURT: What was that? I thought I was clear
22 until that last part you said. You said your desires to
23 produce the medical records relating to work and then you said
24 in the discrimination that you're alleging. Can you be a
25 little bit -- can you clarify that for me a little bit more?

1 MS. WIPPER: Sure. To the one plaintiff that we're
2 aware of that has -- that had a condition or it wasn't a
3 condition but she had stress related pain due to her work
4 stress that she saw her general practitioner about. Other
5 than that plaintiff we're not aware of any plaintiff that has
6 sought any treatment by a doctor related to anything
7 concerning work or the discrimination claims at issue in the
8 case.

9 With respect to the plaintiff that we are aware of,
10 we would be willing to produce those documents if the court
11 thinks they're relevant to her garden variety --

12 MR. BRECHER: Judge, this is Jeff Brecher again.

13 THE COURT: Right.

14 MR. BRECHER: Judge, I think this is precisely where
15 the problem occurs. Now they're saying that there's a
16 plaintiff who has medical treatment as a result of stress and
17 we think that if they're going to testify to that and make
18 that claim then they waive the privilege and need to produce
19 the records that Judge Sullivan ordered. It's unfair to
20 defendants to allow them to testify and then not allow us to
21 have records that might explain [inaudible] other source.

22 THE COURT: Let me --

23 MS. WIPPER: Your Honor, we just learned about this
24 issue yesterday concerning one of the plaintiffs. Again, we
25 would be willing to produce those records if the court deems

1 them relevant with respect to garden variety claims.

2 THE COURT: But your claim is that for this
3 particular plaintiff that she is claiming that she saw a
4 general practitioner as a result of stress that she
5 encountered related to the discrimination. Is that correct?

6 MS. WIPPER: Yes, Your Honor. She saw a doctor, her
7 general practitioner. She did have an issue with intestinal
8 pain because of stress. Given the issue now and the court's
9 concerns about medical records between doctor and a patient
10 that are subject to the psychotherapist privilege, we would be
11 willing to produce those records to resolve the issue.

12 THE COURT: But what is your position on how that
13 sort of claim is garden variety emotional stress?

14 MS. WIPPER: Our position is that garden variety
15 claims are what a reasonable and normal person would
16 experience if subject to a similar type of discrimination at
17 issue in the case. We also -- our reading of the case law is
18 that garden variety claims do not rely on medical evidence and
19 so therefore that type of evidence is not relevant with
20 respect to garden variety claims.

21 THE COURT: Right. But that seems to cut against
22 your argument on that last point if you're going to be relying
23 on -- if you're going to be relying on medical evidence. The
24 fact that she had so much stress as a result of the alleged
25 discrimination that she saw a general practitioner and saw a

1 doctor and is perhaps prescribed medication, how is that then
2 garden variety emotional distress?

3 MS. WIPPER: Your Honor, it's more than garden
4 variety emotional distress. However, given the issue now
5 before the court and defendant's concern that she may testify
6 [inaudible] stress, plaintiffs are proposing that for this
7 particular plaintiff, [inaudible] Pearlman, we will produce
8 these records and if those records are produced our position
9 would be that she had more than garden variety claims because
10 medical evidence would be at issue to prove her claim.

11 THE COURT: Then your position would be that you
12 would turn over any records that she has related to
13 psychotherapy as well?

14 MS. WIPPER: Correct. If she's alleging more than
15 garden variety claims our position is that we would produce
16 those records.

17 MR. BRECHER: This is Jeff Brecher again. We're
18 going to back and forth on this. At first they said there's
19 no claim with anything other than garden variety damages and
20 filed a stipulation to that effect and then now they're
21 telling us well, there is a plaintiff who has more than garden
22 variety of damages and this is what we're concerned about but
23 my -- assuming now that they are stating that there's just one
24 plaintiff that is seeking non garden variety damages --

25 MS. WIPPER: Your Honor, we allege garden variety

1 emotional distress claims for all the plaintiffs and we were
2 willing to clarify that limitation in response to defendant's
3 request for medical information and documents. If defendants
4 want to push and really want the medical records that exist,
5 everything that exists, then we would be willing to produce
6 the records for the one plaintiff that has those records and
7 not limit her claims to garden variety.

8 THE COURT: Okay.

9 MS. WIPPER: If defendants would like us to return
10 to our previous position we'd also be willing to allege only
11 garden variety for all plaintiffs and protect the record.

12 THE COURT: I understand a little bit more clearly
13 now. So your position is that even regarding that plaintiff
14 that you're alleging only garden variety emotional distress
15 and therefore you would not be introducing any of the medical
16 records from her visits to the general practitioner or any
17 testimony relating to her going to a general practitioner, any
18 testimony relating to her gastrointestinal pain or any
19 testimony related to her taking medication as a result of
20 this. Is that what you're saying?

21 MS. WIPPER: Correct. If we were [inaudible] only
22 garden variety claims we would not be relying at all on
23 medical evidence.

24 THE COURT: And then she would not be testifying
25 regarding any of the medical evidence or -- again, my question

1 there I guess is what would her testimony -- I don't want you
2 to preview all of what her testimony might be but regarding
3 this gastrointestinal issue that she saw the doctor for, is it
4 your position that she wouldn't talk about that at all?

5 MS. WIPPER: Not beyond general stress that would be
6 relevant for garden variety.

7 THE COURT: But when you say not beyond general
8 stress, you would just say she was generally stressed and
9 would not mention gastrointestinal pain. Is that what you're
10 saying?

11 MS. WIPPER: Correct.

12 THE COURT: What's defendant's position on that?

13 MR. BRECHER: Judge, I don't know if I'm in a
14 position at the moment to give you an answer on that because
15 this is the first time I've heard this.

16 THE COURT: Let me find out from the parties. What
17 is the deposition schedule at this point? Is there still a
18 deposition scheduled for tomorrow? Is there a deposition
19 scheduled today?

20 MR. BRECHER: There is a deposition scheduled on
21 Friday, tomorrow, and then there's another deposition
22 scheduled next week. I believe it's Carol Cohen and with the
23 individual that we're talking about with the [inaudible]
24 problem and I believe that's Tuesday.

25 THE COURT: Have the other plaintiffs already been

1 deposed, the other lead plaintiffs been deposed?

2 MR. BRECHER: There's one other lead plaintiff who
3 was deposed, Katherine Wilkinson, who withdrew and prejudiced
4 her claim for emotional distress [inaudible].

5 THE COURT: Now that we've had some of this
6 conversation here, let me hear from defendants. I know
7 regarding this one plaintiff this is new information for you
8 but does this adequately allay your concerns about what the
9 plaintiff would be seeking to prove at trial?

10 MR. BRECHER: This is Jeff Brecher again. I think
11 somewhat, yes. I think as long as there's -- I don't know
12 it's going to be memorialized but a stipulation as to what the
13 testimony would be limited to at trial and that it were
14 clearly on the line of what we would consider garden variety
15 which is what we have stated [inaudible] said I was hurt, I
16 was angry, annoyed, that I think would be acceptable.

17 THE COURT: Let me hear from plaintiffs. What's
18 plaintiff's position on that?

19 MS. WIPPER: Your Honor, we've already entered into a
20 stipulation. We would be willing to enter into a stipulation
21 reflecting what we discussed today.

22 MS. CHAVEY: Judge, this is Victoria Chavey also on
23 behalf of MLS Group. One way of I think distinguishing our
24 position from the plaintiffs is that we would be looking for
25 the plaintiffs' testimony not to include any references to

1 what our conditions that may be diagnosed in the DSM-4 or what
2 have you. So stress and anxiety, depression. Those are the
3 kinds of words we would not expect the plaintiffs to testify
4 in connection with explaining how they felt. If they were to
5 use more common lay person language as you were describing
6 like they felt frustrated or angry or upset, that is what we
7 think the case law puts squarely in the hands of garden
8 variety damages but anything that refers to a medical
9 condition, a diagnosable particularly mental health condition,
10 we think that that is outside the scope of garden variety
11 damages and if the plaintiff intends to testify along those
12 lines then we should be entitled to take a look at their
13 medical and mental health treatment records to see what else
14 may have been causing them depressive or stress type symptoms
15 to explore the whole gamut of issues. So that's kind of a
16 simplified way of explaining what our position is.

17 THE COURT: I don't -- I appreciate that. I think
18 that -- I'm not sure if those particular words will help
19 simplify things. I think it's clear that the plaintiffs would
20 not be allowed to testify regarding any kind of diagnosis or
21 to say I was diagnosed with this or the psychiatrist or
22 psychologist told me I suffered from this. I think that at
23 this point some of those general diagnoses have become such --
24 have come in such general usage in society that people don't
25 use them in the clinical sense but I don't want to have a

1 situation in which some plaintiff inadvertently instead of
2 saying I was sad, saying I felt anxious, and then we have
3 everything blow up and have some situation over something like
4 that.

5 But I think we're all on the same page in terms of
6 what we're trying to accomplish and what we're trying to limit
7 but again I wouldn't want to have a situation in which some
8 plaintiff or some lawyer in the heat of cross examination
9 didn't use the words as carefully and said oh, you felt
10 depressed or you felt a little anxious. I think that's a
11 little different than saying you were diagnosed as having
12 clinical depression or that you were diagnosed with an anxiety
13 disorder or something of that sort. But it seems that -- I
14 think -- it appears that we're all on the same page now I
15 thin.

16 I think that we've now gotten clarification exactly
17 in terms of what the plaintiffs are seeking I believe. But
18 let me hear from the parties again. Let me hear from
19 plaintiff on that and make sure that we're -- let me just hear
20 from everyone. Are we all on the same page here?

21 MS. WIPPER: Yes, Your Honor, you described our
22 position perfectly.

23 THE COURT: And defendants.

24 MR. BRECHER: Judge, I think generally yes, we're on
25 the same page. I think just as far as some of the details and

1 the language, we would -- again, if someone testifies that
2 they felt depressed I would think that that is on the other
3 side.

4 THE COURT: That is on the other side in terms of
5 what?

6 MR. BRECHER: That would be non garden variety.

7 THE COURT: Why is that?

8 MR. BRECHER: Because depressed -- certain depression
9 would be non garden variety and I think that depressed is
10 pretty close to depression and I don't know if many people
11 would be able to make the distinction between the two and a
12 lot of -- in a lay sense feeling depressed someone believe
13 that to mean depression [inaudible].

14 THE COURT: I understand your point and I think --
15 let me not be -- let me make sure that I'm clear on this. I'm
16 certainly not suggesting that I think it would be a good idea
17 for the plaintiffs to use those words but again I think just
18 sometimes in the common parlance that goes around today
19 sometimes people lapse into those general sorts of words I
20 felt probably not anxious but I think it's pretty common for
21 people to say I feel -- they have children under the age of
22 ten who say I feel depressed just -- as another way of saying
23 they feel sad. It seems like that's certainly the sort of
24 thing that probably could be cured with a curative instruction
25 to the jury that -- if the parties would want that. Some sort

1 of curative instruction saying that there has been no medical
2 testimony and there has been no testimony about anyone's
3 mental health, state of mental health or anything of that
4 nature.

5 Again, I just don't want to have a situation in
6 which we're being so hyper technical as lawyers that we have
7 some problem in terms of the way that the trial may actually
8 be conducted if it gets to that point. I know that we're all
9 lawyers and former lawyers and we tend to try to choose our
10 words very carefully and words mean a lot to us. I don't know
11 if common jurors, if every day jurors subscribe to that same
12 sort of philosophy. So I'm not sure that it would be a good
13 idea to make any definitive ruling indicating that if someone
14 says the word depressed -- again, obviously what's happening
15 here is we're all on the same page.

16 Obviously the plaintiffs are seeking only garden
17 variety emotional damages and obviously at this point the
18 defendants technically may be trying to figure out a way to
19 state that the plaintiffs have waived that privilege and
20 opened the door such that they'd be entitled to all this other
21 information but let's try to -- I'd like to try to do it in as
22 practical and as narrow way as possible without being so
23 narrow that we cause unnecessary confusion.

24 But it seems that it may be best for the parties to
25 take a crack at trying to arrive at a stipulation and be as

1 specific as possible. It certainly may be possible that
2 the -- I don't know these plaintiffs individually. It may be
3 possible that the plaintiffs can be coached in such a manner
4 that they will not use those words and if all the parties feel
5 confident that there won't be a problem but let's just again
6 keep that in mind because again I think that the plaintiffs
7 probably are such that they can be coached not to use those
8 words but sometimes lawyers in the heat of battle may use
9 synonyms that may be unfortunate.

10 But let's have the parties sit down. Do you
11 think -- do the parties feel at this point that they can work
12 out a stipulation to this effect to our mutual understanding
13 as to what's happening here?

14 MS. WIPPER: Yes, Your Honor.

15 MR. BRECHER: Yes, Your Honor.

16 THE COURT: All parties are in agreement with that?

17 MR. BRECHER: Yes, Your Honor.

18 MS. WIPPER: Yes, Your Honor.

19 THE COURT: So let's have the parties work on this
20 stipulation and see if you can get the language sorted out. I
21 think it's helpful to do this as soon as possible. When can
22 the parties work out the language of the stipulation?

23 MS. WIPPER: Plaintiffs are available today to work
24 it out before the deposition tomorrow.

25 THE COURT: What about defendants?

1 MR. BRECHER: We're available, Judge.

2 THE COURT: So let's have the parties work this out
3 and let's have the parties go ahead and file a copy or just
4 email to my chambers a copy of the stipulation once the
5 parties have agreed upon that tomorrow.

6 [Pause in proceedings.]

7 THE COURT: Actually let's do this. Let's have the
8 parties actually fax it. We'll go a little bit older in terms
9 of the technology. Let's have the parties fax it to chambers
10 and if you could fax it tonight that would be good. The fax
11 line is -- hello, are the parties there?

12 [Pause in proceedings.]

13 THE COURT: So, yes, I had to find out what our fax
14 line was. The fax line to chambers is 212-803 -- 805-7995.
15 So fax that to chambers tonight and -- so what we are doing is
16 we are -- now that we have this clarification we are modifying
17 Judge Peck's order which was an adoption of Judge Sullivan's
18 order. So I guess we're modifying Judge Peck's order and
19 Judge Sullivan's order.

20 MALE VOICE: Your Honor, this is George [inaudible]
21 from [inaudible] dispute [inaudible] and I mentioning this at
22 the end of this only because I've listened but I would think
23 the meet and confer is between the MSL Group as the defendant
24 and the plaintiffs. So you mentioned all parties. This is
25 not a matter in which we've been involved. So I would submit

1 I don't have to participate in the meet and confer and
2 stipulation. I think it's adequate for the stipulation just
3 between [inaudible] the MSL Group.

4 THE COURT: I think that makes sense to me. Do the
5 parties have anything to add to that?

6 MS. WIPPER: No, Your Honor. This is Janette Wipper
7 for the plaintiff. There is just one other issue we wanted to
8 clarify before we ended the call. On the issue of the
9 \$25,000.00 cap --

10 THE COURT: There is no cap. There's no cap. I
11 think that's something that the jury would have to determine
12 at a later date. I'm not putting any cap on anything at this
13 point.

14 MS. WIPPER: Thank you, Your Honor.

15 THE COURT: Again, for clarification, yes, the
16 parties involved in the stipulation should obviously work on
17 that stipulation. All parties who are affected by the
18 stipulation should work on that and fax that to chambers
19 tonight.

20 Anything else from plaintiff today?

21 MS. WIPPER: No, Your Honor.

22 THE COURT: Anything else from defendant?

23 MR. BRECHER: No, Your Honor. Thank you.

24 THE COURT: Anything from anybody else?

25 (Parties state no.)

THE COURT: Thank you very much. Have a good day.

* * * * *

1 I certify that the foregoing is a court transcript from
2 an electronic sound recording of the proceedings in the above-
3 entitled matter.

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5 _____
6 Shari Riemer

7 Dated: January 25, 2012
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